

1 whatever flaws were uncovered in the testing had
2 been remedied?

3 A. Yes, it does.

4 Q. So when you say something is fully tested and
5 operational, you mean that there are no flaws you
6 are aware of in the systems that are still out
7 there unfixed?

8 A. I don't think I could categorize it as absolutely
9 no flaws in the system. I don't think that I
10 could ever, you know, categorize that there are no
11 flaws in the system or any other system that is
12 developed. There is no flaws that would impair a
13 provider from doing business with it.

14 Q. Since the time you submitted your testimony you
15 have learned that there are at least a handful of
16 errors with respect to the MORTEL system, isn't
17 that --

18 A. That is correct.

19 Q. And since you became aware of that fact, does that
20 change your opinion as to whether your systems are
21 fully tested and operational?

22 A. It doesn't change my testimony as of when I filed
23 it. But I do concede that there are some flaws or
24 some errors that need to be resolved with the
25 systems.

1 Q. Okay. So your state of knowledge today is there
2 are some errors there that have to be fixed before
3 you can state with confidence under oath that your
4 systems are fully tested and operational?

5 A. That is correct.

6 MR. HUGHES: That's all I have.

7 EXAMINER JAMES: Anyone else before the
8 staff?

9 (No response.)

10 EXAMINER JAMES: Mr. Kelley.

11 Cross-Examination

12 By Mr. Kelley:

13 Q. Mr. Rogers, you've reviewed Ms. Wiecki's direct
14 and rebuttal testimony, have you not?

15 A. Yes, I have.

16 Q. And directing your attention to your own rebuttal
17 testimony at page 7.

18 MR. DAWSON: Do you have that, Joe?

19 THE WITNESS: Yes, I do.

20 BY MR. KELLEY:

21 Q. About the middle of the page, there is a question
22 have you reviewed Ms. Wiecki's opinions in which
23 she purports to find a correlation between the
24 frequency of missed due dates and whether the
25 underlying order was processed manually or

1 electronically. You answered in the affirmative.
2 And then you were asked to comment upon her
3 opinions, and your answer began, I do not know how
4 Ms. Wiecki made the calculations upon which she
5 relies, and so I am not able to agree or disagree
6 with the arithmetic in her testimony.

7 My question to you is did you ask to see
8 Ms. Wiecki's calculations?.

9 A. No, I did not.

10 Q. At page 8 of your rebuttal testimony.

11 A. Okay.

12 Q. The question and answer in the center of the page,
13 I'll characterize it, and if you dis-- question
14 was to the -- the question asked whether you
15 agreed with assertions of Ms. Wiecki and Mr.
16 Connolly that the frequency of orders processed
17 manually should be of concern to this commission.
18 And you answered in the negative; is that correct?

19 A. That's correct.

20 Q. And you based that answer on your experience
21 stating in fact that in practice there is no
22 difference?

23 A. That's correct.

24 Q. Just how complete is your experience? For
25 example, are transactions processed when you are

1 (Whereupon, Ameritech
2 Exhibit Nos. 11.0 and 11.1 were
3 admitted into evidence
4 as of this date.)

5 JUDGE GUERRA: Cross?

6 MS. MARSH: I'll start.

7 CROSS EXAMINATION

8 BY

9 MS. MARSH:

10 Q Good afternoon, Mr. Meixner.

11 A Good afternoon.

12 Q My name is Joan Marsh and I work for
13 AT&T. I have a few questions for you.

14 I understand you are a partner with
15 Anderson Consultants; is that correct?

16 A That's correct.

17 Q How long have you been a partner with
18 Anderson?

19 A Since 1984.

20 Q In what portion of your career with
21 Anderson have you devoted to establishing or
22 developing expertise in the systems world?

1 what materials would be reviewed in connection
2 with Anderson's work; is that correct?

3 A That's correct.

4 Q Did you participate in the decision as to
5 what materials would be reviewed?

6 A Well, if it was a joint, yeah.

7 Q Did you personally participate in that
8 decision?

9 A On most of it, yes.

10 Q Did Anderson request from Ameritech any
11 materials -- strike that.

12 Did Ameritech refuse to produce any
13 materials that were requested by Anderson in
14 connection with their review?

15 A No. Some took a while to get, but we
16 generally got what we asked for.

17 Q But, generally speaking, if Anderson
18 Consulting wanted to see it, the materials were
19 produced; is that correct?

20 A Yes.

21 Q In connection with the review that took
22 place in the month of March, did Anderson

1 Consulting or any one of the members of the 34
2 member Anderson team review any problem logs in
3 connection with the operation of Ameritech's OSS?

4 A No.

5 Q Did you or any one of the 34 member
6 Anderson team review the order testing problem
7 log that was attached to Mr. Connolly's
8 testimony?

9 A No.

10 Q Did you or any one of the 34 member
11 Anderson team review the AIIS testing problem log
12 that was attached to Mr. Connolly's testimony?

13 A No.

14 Q Did you or any one of the 32 member
15 Anderson team review the resale bugs not fixed
16 log attached to Mr. Connolly's testimony?

17 A No.

18 Q Did you or any one of the 34 member
19 Anderson team review the issues general log that
20 was attached to Mr. Connolly's testimony?

21 A No.

22 Q Did you or any one of the 34 member team

1 make any effort or ask anyone at Ameritech if
2 problems with the OSS systems were tracked?

3 A As part of this too, operational
4 readiness, we asked Ameritech to provide us with
5 any data, including test data or whatever, that
6 would show us that the systems had been tested,
7 but those logs you mentioned were not the
8 material that was provided to us.

9 Q My question was, did you or any one of the
10 34 member Anderson consulting team ask Ameritech
11 if they had any system by which they tracked
12 problems they were experiencing with their OSS?

13 A No.

14 Q Did you or any one of the members of your
15 Anderson consulting team ask any Ameritech
16 employee if they maintained any logs of problems
17 that Ameritech experienced with the OSS?

18 A Yeah. We asked about records of, you
19 know, past things that were faxed in production.
20 We could review live usage and internal testing
21 and wondered about things that had been fixed
22 historically. And the people we asked were not

1 able to provide us with those.

2 Q Who did you ask?

3 A Some people that worked in the AIIS
4 organization. I don't remember their names off
5 the top.

6 Q Did you ask Mr. Owczurak if he was aware
7 of any of those materials?

8 A He's one of the people we worked closely
9 with, yes.

10 Q And isn't it true that Mr. Owczurak, in
11 fact, maintains the problem logs Mr. Connolly
12 attached to his testimony?

13 A I don't know who maintains them.

14 Q And when you asked Mr. Owczurak if he had
15 any materials or data about problems, what did he
16 respond?

17 A He gave us the testing results.

18 Q Again, did you ask Mr. Owczurak
19 specifically if he had any materials or data
20 about problems that Ameritech was experiencing
21 with the OSS?

22 A I did not. My team members who were

1 reviewing the test results asked for any data
2 that would help substantiate past problems or
3 ability to fix them and so forth, but we did not
4 get any data on that.

5 Q Did you or any one of your members of the
6 Anderson Consulting team review any of the issues
7 lists that are maintained by AT&T and Ameritech
8 that relate to issues that are arising in AT&T's
9 use of the OSS?

10 A No. All those issues that you mentioned,
11 the issue logs, bug logs, et cetera, the first I
12 saw of those was in a supplemental data request.

13 Q Were you made aware of the fact that AT&T
14 employees and Ameritech employees participated in
15 daily conference calls to address problems that
16 AT&T was having with the system?

17 A I was made aware of that.

18 Q Did you or any member of your team attempt
19 to determine what those problems were?

20 A No. We asked what the -- what was -- you
21 know, what was the purpose of it. And they said
22 they were trying to work constructively to solve

1 some of the reasons that orders were rejected but
2 didn't have any documentation that they could
3 produce to show us what it was.

4 Q Ameritech told you that it did not have
5 any documentation that it could produce in
6 connection with those daily conference calls?

7 A All I know is that there were daily or
8 weekly conference calls, but I don't remember if
9 I asked. I could check with my team, some of
10 them are here today, if we asked that
11 specifically.

12 Q Did you make any attempt to determine if
13 the problems being discussed during those daily
14 conference calls had been resolved to AT&T's
15 satisfaction?

16 A Well, I got to admit, it seemed kind of
17 funny on the rejects that some of the same
18 reasons kept coming up over and over. We
19 wondered if the conference calls were bearing
20 fruit. But, you know, aside from some of the
21 individual items that were mentioned in
22 Mr. Connolly's testimony, it looks like some of

1 them have been kind of resolved. But it was kind
2 of surprising to us just looking at it from one
3 side of the fence that these issues weren't
4 resolved more quickly.

5 Q My question was more specific than that.

6 In the course of your review leading
7 up to your testimony, did you or any member of
8 your team attempt to determine if the problems
9 discussed during those daily conference calls had
10 been resolved to AT&T's satisfaction?

11 A No, we did not talk to any other carriers.

12 Q Did you or any member of your team make
13 any attempt at all to contact any of the CLECs
14 that were using Ameritech's OSS to determine what
15 their experience with the systems had been?

16 A No, we did not.

17 Q Did you make any attempt to determine if
18 any CLECs had expressed any concerns or
19 registered any problems regarding the use of the
20 systems?

21 A No. We talked about that at the beginning
22 of the project with Ameritech but -- with

1 Mr. Rogers. And the response we got was that
2 that might not be a worthwhile use of time
3 because -- we kind of walked into this without
4 knowing all the history, but apparently it was
5 not a cordial relationship always. He thought
6 given what we needed to do as far as reviewing
7 testing and so forth, it would probably not be
8 productive to try and talk to them. Based on
9 some things we observed later, you know, he
10 probably was right. But probably would have
11 been -- shed a little more light on some of these
12 topics.

13 Q Given your experience as a systems expert
14 with Anderson Consultant, would you agree with me
15 that it is important to talk to users of a system
16 to determine if the system is, in fact,
17 operational?

18 A In general, yes. This case has a number
19 of unique circumstances that, you know, make it a
20 little different.

21 Q So in this case, it's your opinion as a
22 systems expert from Anderson Consulting that it

1 would not have been useful to talk to CLECs about
2 their use of the systems?

3 A I think in this case since, you know -- in
4 general, when Anderson Consulting designs a
5 system for a client, we have users and we solicit
6 their input during the system testing phase of
7 the project.

8 In this case, you had a separate group
9 that was building their own systems that could
10 have had problems on their side of the fence as
11 far as utilizing the interfaces. So we made a
12 decision that we would look at the system once
13 the orders and so forth made it into the
14 operation support systems and try to ensure that,
15 if received according to the Ameritech specs, it
16 would process positively.

17 Q And did you make any effort to determine
18 if CLECs like AT&T had any concerns about the way
19 the orders were being processed internally at
20 Ameritech?

21 A We did not talk to any CLECs.

22 Q Did you interview any Ameritech account

1 reps who interfaced directly with the CLECs to
2 determine if they had any information or data
3 about CLEC problems with the interfaces?

4 A Only to the extent that some of the resale
5 services guys, the project managers that helped
6 develop those told us some of the issues that
7 some of the CLECs had raised.

8 Q And did you make any attempt to determine
9 if those issues had been resolved?

10 A Well, that was part of, you know, what
11 went into the operations guides, that some of the
12 those issues or questions they had were included
13 then in the final product.

14 Q Do you know if any one of the 34 member
15 Anderson team talked to Bonnie Hemphill, the AT&T
16 account manager for Ameritech?

17 A I don't think.

18 Q Now, as I understand your testimony, your
19 team relied largely on testing that had been
20 conducted; is that correct?

21 A For the operational readiness, yes.

22 Q All right. And having reviewed all the

1 materials that were produced in connection with
2 your review, it would appear that you relied
3 largely on the internal testing done by
4 Ameritech. Is that an accurate assessment of the
5 review?

6 A Yeah. In cases where their carriers
7 weren't using the system, that's what we relied
8 on.

9 Q In fact, as recently as last Friday, in
10 your testimony you wrote that internal testing
11 persuades you that the OSS systems will function
12 properly; is that correct?

13 A I said -- I believe I said it provides
14 some level of assurance that the systems would
15 operate properly, yes.

16 Q Let me refer you to your testimony.

17 MS. SUNDERLAND: Looking for Page 7?

18 MS. MARSH: Page 7 of the rebuttal?

19 MS. SUNDERLAND: Hm-hmm.

20 BY MS. MARSH:

21 Q Yes. On Page 7, don't you indicate there
22 that, Our review of the internal testing

1 persuades us that the OSS systems function
2 properly as they were designed to do?

3 A Yes.

4 Q And don't you also indicate there that,
5 After a system has been internally tested we do
6 not typically see a significant volume of high
7 priority errors; is that true?

8 A Hm-hmm.

9 Q And do you believe that statement is true
10 in this case?

11 A That we will not see a high priority, high
12 volume?

13 Q No. That after the time that the
14 Ameritech systems have been proven satisfactory
15 through internal testing, that Ameritech did not
16 see a high volume of high priority errors.

17 A Well, in this case, since the CLECs are
18 building their own systems and that was not
19 included, you know, there could be errors that
20 come through the system from the CLEC side,
21 that's correct.

22 Q So do you believe that statement is true

1 in this case?

2 A I guess we would -- I could modify that to
3 say we would not see a significant volume of high
4 priority errors assuming that the orders are
5 submitted in accordance with the Ameritech specs.

6 Q Now, isn't it true that internal testing
7 done by Ameritech supported a conclusion that
8 these systems were operationally ready as of
9 January 2nd?

10 A I'm sorry. Could you repeat that.

11 Q Yes. Isn't it true that the internal
12 testing performed by Ameritech supported a
13 conclusion that the OSS systems were
14 operationally ready as of January 2nd?

15 A You mean in prior hearings or testimony?

16 Q Did you review the affidavit that was
17 submitted by Ameritech to the FCC when it filed
18 for interLATA relief on January 2nd?

19 A No, I didn't.

20 Q Do you have any understanding or were you
21 aware of the fact that Ameritech filed for
22 interLATA relief on January 2nd?

1 A I was aware they filed earlier. I didn't
2 know when.

3 Q And would you agree with me that that
4 affidavit or that filing was supported by an
5 affidavit that the systems were operationally
6 ready?

7 MS. SUNDERLAND: I think he's already
8 testified he doesn't know.

9 MS. MARSH: Okay.

10 BY MS. MARSH:

11 Q Would you agree with me that since January
12 2nd, that many problems have indeed arisen in
13 Ameritech's systems?

14 A With respect to the OSS interfaces, which
15 is what we looked at, there have been many
16 rejected orders, that's correct.

17 Q Other than rejected orders, would you
18 agree that since January 2nd, there have been
19 many problems that have been documented as it
20 relates to Ameritech's OSS systems?

21 A Depends on how you look at it. I mean,
22 through the interfaces, which is what we

1 reviewed, you know, that's what we reviewed.
2 Down stream from that are the OSS, the legacy
3 systems. And I don't know the extent or the
4 number of problems that have been found in the
5 down stream systems at all.

6 Q Let me hand you what was attached to
7 Mr. Connolly's testimony as Exhibit No. 13. Did
8 you have an opportunity to review that after
9 Mr. Connolly made it available to you through his
10 testimony?

11 A I saw this for the first time, I believe
12 on, Sunday.

13 Q Doesn't -- in your supplemental rebuttal
14 testimony, when was that filed, on last Friday?

15 A Right.

16 Q I believe you indicated you saw that log
17 for the first time Sunday?

18 A I'm trying to remember. I was in Europe
19 last week. Part of this was faxed to me when I
20 was out of the country, but I didn't see the
21 complete log, I think, until I got back..

22 Q And that was Sunday, two days ago Sunday?

1 A Yeah.

2 Q So prior to filing your supplemental
3 rebuttal testimony, it's your testimony that you
4 did not have an opportunity to review that log in
5 its completion?

6 A What's the date on this? 4/10. Yeah, not
7 in its completion.

8 Q Can you turn to your supplemental rebuttal
9 testimony on Page 11. The question in the middle
10 of the page indicates that in his testimony
11 Mr. Connolly refers to certain Ameritech Illinois
12 reports on order rejections including the log
13 that you're holding. Have you reviewed those
14 reports? And your answer is yes.

15 A Right.

16 Q Was that answer accurate as of last Friday
17 when this testimony was filed?

18 A Not in entirety. I had certain parts of
19 this faxed to me. I discussed it with my team on
20 the phone but did not personally go through this
21 entire thing.

22 Q But you now have had an opportunity to go

1 through that entire log; correct?

2 A You mean this log?

3 Q Yes.

4 A Yes.

5 Q Doesn't that log include a report or data
6 on in excess of 400 system problems that
7 Ameritech has experienced since January 2nd?

8 A Well, yeah. I didn't count them up, but
9 that sounds about right.

10 Q And as I understand that log, Ameritech
11 prioritizes the systems or the problems that it
12 lists in it; is that correct?

13 A That's correct.

14 Q And do you know what a Priority 1 Problem
15 according to Ameritech's code means in that log?

16 A Priority 1, in my understanding, is the
17 most serious and it goes down from there.

18 Q And a Priority 1 Problem is identified by
19 Ameritech as a customer impacting problem; is
20 that correct?

21 A I believe so.

22 Q Can you tell me how many Priority 1

1 problems have been identified by Ameritech since
2 January 2nd?

3 A Excuse me. What is the date? I can't
4 read the date on this because -- the reason I'm
5 confused is because the report --

6 Q The report was actually run and produced
7 on April 10th which is the date up in the corner,
8 but the log tracks problems at the beginning of
9 the year.

10 A Right. Okay. I'm getting confused
11 because this had the same title as the report I
12 reviewed which is the order testing problem log,
13 and it was dated as of a later date. I don't
14 recall if it was like late April or early May.

15 Q Well, it's very possible that Ameritech
16 may have sent you a more recent version. This is
17 the only version that --

18 A Right. That's why I was confused that
19 this was this big. I thought I only saw part of
20 it. I think I saw the whole thing of the more
21 current version.

22 And at that time, I had not seen this.

1 one that showed -- I saw one that showed the open
2 issues or open problems as of late April, early
3 May. And I believe there was 45 problems on it
4 at that time.

5 Q Okay. I'm not sure what document you're
6 referring to. This document was attached to
7 Mr. Connolly's testimony and it's the one that I
8 wanted to -- have you reviewed this document?

9 A Right. I was just going off the title
10 here. I reviewed the report, this report. I
11 read the title. And I saw a later version of the
12 report with this title.

13 Q Okay. I don't remember what my question
14 was. Let me start again.

15 A About the numbering.

16 Q Can you tell me how many number --
17 Priority 1 problems Ameritech has experienced
18 with its systems since January 2nd, 1997?

19 A The report I saw which was the open ones
20 as of a week ago didn't have any, but there are
21 some in here as I page through it.

22 Q Yes. As a matter of fact, there are.